

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNION CAPITAL GROUP, LLC, : Case No.: 1:21-cv-01741-LDH-  
: PK  
  
Plaintiff :  
  
- against - :  
  
SULTAN CAPITAL GROUP, LLC, a New York :  
corporation, and GUY SULTAN, :  
: :  
Defendants. :  
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**DECLARATION OF DEFENDANT GUY SULTAN**

1. I, the undersigned, an individual defendant herein and the sole owner of defendant Sultan Capital Group, LLC, declare the truth of the following under penalties of perjury.

2. On January 18, 2022, I discharged my attorney Paul M. Sod, Esq. from representing me and representing Sultan Capital Group LLC. Simply put, I cannot afford to pay his bills.

3. I desire to represent myself in this action without the assistance of an attorney.

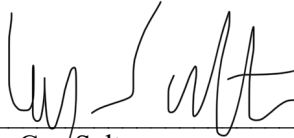
4. Mr. Sod has advised me that representing myself is a highly risky proposition which increases the chances that the Plaintiff will obtain a judgment against me and decreases the chances that I will be unsuccessful in my counter-claim against the Plaintiff and potential third party claim against prospective third party defendants Yakov Borenstein and Chaim Vail.

5. I understand those risks and willingly accept them.

6. As to defendant Sultan Capital Group LLC, I have been advised that this entity cannot appear in this action without a lawyer. Neither Sultan Capital Group LLC nor I have funds to pay a lawyer and there is nothing that I can do to continue the defense of that entity. I have discharged Mr. Sod and will not be able to retain new counsel, and the court is requested to grant

as much leniency to Sultan Capital Group LLC as is allowed by the law.

7. I consequently request that the court grant my application and allow me to proceed in this matter pro se, without the assistance of counsel.

  
\_\_\_\_\_  
Guy Sultan

Affirmed to be true  
Under penalties of perjury  
This January 19, 2022